



June 30, 2006

Mr. John Carlson, Executive Director
California Fish & Game Commission
1416 Ninth Street
Sacramento, CA 95814

Dear Mr. Carlson and members of the Commission:

The Commission is about to undertake the first phase of implementing the Marine Life Protection Act (MLPA) by adopting a network of MPAs along the Central Coast. As this phase of the design process comes to a close, one pressing question is what region the process will focus on next. The Natural Resources Defense Council (NRDC) and The Ocean Conservancy (TOC) ask that the design process move north, to the adjacent area from Año Nuevo to Cape Mendocino.

We make that recommendation after a careful evaluation of how well each option meets the criteria the MLPA Initiative used for selecting the initial study region in the central coast. Those criteria are contained in the MLPA Master Plan Framework adopted by the Commission last year. The highlights of that evaluation are summarized below, with a focus on those criteria for which the southern and north central regions differ.

Biophysical boundaries. The Blue Ribbon Task Force recommended and the Commission adopted two biogeographic provinces—divided by Point Conception—as the main regions to be used in implementing the MLPA. From this bioregional perspective, the area from Año Nuevo to the Oregon border is part of the same province as the central coast. The kinds of species and habitats found north of Point Conception are very different from the species and habitats of the warmer water to the south. Año Nuevo itself has been one of the most hotly debated MPA sites in the central coast process; looking north allows it to be considered in a larger context, in terms of how an MPA there would fit within a larger network. Completing the network north of Point Conception before moving further south makes sense for biogeographic continuity and completeness.

The Blue Ribbon Task Force and the Commission also recognized that, on a planning scale, a region stretching from Pt. Conception to the Oregon border is too large to be workable, and the Framework identifies a number of options for sub-province boundaries based on biogeography, including one at Cape Mendocino where a shift in some species assemblages occurs. A region stretching from Año Nuevo to Cape Mendocino meets the criteria for reasonable travel distances and for a range over which interested parties might be expected to have a working knowledge.

Amount of habitat mapped. Discussions with mapping experts revealed similar amounts of habitat mapped in the region south of Point Conception and the north central region. In addition, substantial underwater mapping projects are planned for both areas over the next two years.

Human activity boundaries. The north central region contains a patchwork of accessible and heavily used areas as well as more remote locations, which can help in placing MPAs to achieve a better balance of benefits and impacts. By contrast, the area south of Point Conception is the most densely populated coastline in the state.

Potential partners. Moving north also takes advantage of the federal resources available along this section of the coast, including the three National Marine Sanctuaries in the area and Point Reyes National Seashore. These partners can provide vessels with monitoring or enforcement capability, maps, historical monitoring data and staff assistance, among other resources.

Scientific knowledge and research. The north central region is well studied by local research institutions such as the U.C. Davis Bodega Marine Lab and Point Reyes Bird Observatory Conservation Science, among others. Long-term continuous databases exist for a number of parameters related to the health of fisheries and marine ecosystems.

Potential benefits. Finally, the north central region is home to many of the declining rockfish species that stand to benefit from MPAs. According to a recent paper by Phillip Levin et al, it is part of a broader region that has experienced a reduction in average fish size, across a range of different species, of 45% over the past two decades as well as a shift in species assemblages due to fishing pressure.¹ Scientists believe that these types of ecosystem-scale changes are better addressed through a combination of area protection strategies and catch and effort limits than through one or two of those tools alone.² MPAs in this area can build on the essential fish habitat designations in adjacent federal waters, offering more comprehensive protection for rockfish and critical underwater habitats.

NRDC and TOC are committed to supporting the MLPA process through the design of a full statewide network and implementation and monitoring in years to come. We strongly believe that a sound and scientifically-based network of MPAs will contribute to a legacy of healthy oceans and sustainable coastal communities for future generations. We ask the Commission to move the MLPA process to the north central region, as the area that best meets the selection criteria in the Master Plan Framework. We appreciate your consideration of these comments.

Sincerely,



Karen Garrison
NRDC



Warner Chabot
TOC

¹ Levin, Phillip S., Elizabeth E. Holmes, Kevin R. Piner, and Chris J. Harvey (in press). Shifts in a Pacific Ocean fish assemblage: the potential influence of exploitation. *Conservation Biology*. The data on which these trends are based covers the area from Point Conception north to the Canadian border.

² Stefansson, Gunnar and Andrew A. Rosenberg. 2005. Combining control measures for more effective management of fisheries under uncertainty: quotas, effort limitation and protected areas. *Phil. Trans. R. Soc. B* 360, 133-146.

Cc: Resources Secretary Mike Chrisman
Director Ryan Broddrick
BRTF Chairman Phil Isenberg